Dynamic
FABRICATORS LLC

September 26, 2007

Mr. Harbi Elshafei
Air Quality Division
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

Re: Dynamic Fabricators LLC
Air Operating Permit Renewal Application
Supplemental Information

Dear Mr. Elshafei:

In response to your questions on CAM Applicability and Insignificant Source Emissions, please accept the following information as a supplement to the AOP application submitted October 4, 2004.

CAM Applicability

CAM only applies to a source that is subject to an pollutant-specific emissions limitation, uses a control device to achieve compliance with the emissions limitation, ***and*** has potential pre-control device emissions equal to or greater major source thresholds.

The only control devices at the facility are (1) the filter bank for the wood shop and (2) the filters for the laminating area – both of which control particulate emissions.

- Since the wood shop is not vented outdoors (the filter bank is a recirculating filter installed for safety reasons, not environmental), the potential uncontrolled emissions are 0 tpy.
- The potential PM emissions from the laminating area are 62.0 tpy worst case as presented in Dynamic Fabricator's April 21, 2004 letter which supplemented the November 19, 2003 PTC application.

Potential PM emissions from both of these sources are below the major source level of 100 tpy for PM or PM10 and as such the third criteria does not apply and CAM is not applicable.

Emissions of a-methyl styrene, styrene, MMA, vinyl acetate, and MEK from the laminating area are uncontrolled and as such they are not subject to CAM.

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Insignificant Activities
According to IDAPA 58.01.01.006.101.a.v (IAC 2007), the significant emission rate for ozone is 40 tpy of VOCs and according to IDAPA 58.01.01.006.101.a.iv (IAC 2007), the significant emission rate for particulate matter is 25 tpy PM and 15 tpy PM10.

The emissions calculations for the PVC Gluing and Mold Release Applications were updated based on potential chemical usage, 2006 actual production and process knowledge.

As referenced in the Tier 1 Renewal Application on page 5:

- Items 5 (PVC Pipe & Manifold Gluing Operations) – actual emissions (CY 2006) were below 10% of thresholds, and potential emissions are less than significant source levels and less than 1 tpy per individual HAP. The calculations have been revised to incorporate both potential and actual emissions – see attachment which should replace page 6 in the Tier 1 Renewal Application.

- Item 6 (Mold Preparation and Release Application Operations) – actual emissions (CY 2006) were below 10% of thresholds and potential emissions are less than significant source levels and less than 1 tpy per individual HAP. The calculations have been revised to incorporate both potential and actual emissions – see attachment which should replace page 6 in the Tier 1 Renewal Application.

- Item 8: Wood shop activities are not discharged from the facility and the filter system does not have an emergency discharge to atmosphere. The filter system exists as a safety measure to ensure wood dust accumulation on the building structure do not affect employee health or create fire hazards. Therefore, potential and actual PM emissions are 0 tpy.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions, feel free to call me at (208) 773-1787.

Sincerely,

Wade Wolcott
President

Attachment – "Insignificant Emissions Calculations"
c: Beth Fifield Hodgson, Spring Environmental, Inc.

Insignificance Calculations for PVC Gluing, Mold Release Application and Unpaved Road Fugitive Emissions determinations

A. PVC Gluing

Potential VOC & HAP Emissions			VOC		MEK	
Product	Gal/year	lb/gal	%	lbs	%	lbs
PVC Primer	82	7.17	100.0%	587.9	37.0%	217.5
PVC Glue	764	7.77	54.7%	3247.1	23.0%	1365.3
Totals (tpy)				**1.9**		**0.8**
Limit (tpy)				*40.0*		*1.0*

Actual (2006) VOC & HAP Emissions			VOC		MEK	
Product	Gal/year	lb/gal	%	lbs	%	lbs
PVC Primer	6	7.17	100.0%	43.0	37.0%	15.9
PVC Glue	78	7.77	54.7%	331.5	23.0%	139.4
Totals (tpy)				**0.2**		**0.1**
Limit (tpy)				*4.0*		--

B. Release Applications

Potential VOC & HAP Emissions			VOC		MEK		Xylene		1,2,4-Trimethyl Benz		Toluene	
Product	Gal/year	lb/gal	%	lbs	%	lbs	%	lbs	%	lbs	%	lbs
Chemlease 15 Sealer	25	7.34	99.0%	181.7			55%	100.93	20%	36.70		0.00
Chemlease Mold Cleaner	40	6.92	100%	276.8	50%	138.40					50%	138.40
Chemlease PMR (Primer)	75	7.26	99.0%	539.1	60%	326.70			20%	108.90		
Rexco Partall Paste #2	550	6.57	67.6%	2442.7								
Rexco Partall Film #10	60	7.92	36.5%	173.4								
Totals (tpy)				**1.8**		**0.2**		**0.1**		**0.1**		**0.1**
Limit (tpy)				*40.0*		*1.0*		*1.0*		*1.0*		*1.0*

Potential VOC & HAP Emissions			VOC		MEK		Xylene		1,2,4-Trimethyl Benz		Toluene	
Product	Gal/year	lb/gal	%	lbs	%	lbs	%	lbs	%	lbs	%	lbs
Chemlease 15 Sealer	6	7.34	99.0%	43.6			55%	24.22	20%	8.81		0.00
Chemlease Mold Cleaner	9	6.92	100%	62.3	50%	31.14					50%	31.14
Chemlease PMR (Primer)	19	7.26	99.0%	136.6	60%	82.76			20%	27.59		
Rexco Partall Paste #2	129	6.57	67.6%	572.9								
Rexco Partall Film #10	16	7.92	36.5%	46.3								
Totals (tpy)				**0.4**		**0.1**		**0.0**		**0.0**		**0.0**
Limit (tpy)				*4.0*		--		--		--		--

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C. Fugitive Emissions, Vehicle Traffic on Unpaved Roads

The emission factors for vehicle traffic on unpaved roads were derived from A-42, Section 13.2.2, September 1998.

E=k*(sL/12)^0.8* (W/3)^0.4/(M/0.2)^0.3

where:	PM30	PM10	
k=	10	2.6	base emission factor (lb/VMT)
sL=	18.8	18.8	silt content (%)
W=	5	5	Fork Truck weight (tons)
W=	1.5	1.5	Car weight (tons)
W=	7.5	7.5	Truck weight (tons)
M=	10	10	Surface moisture content, %
E=	5.43	1.41	Emission factor (lb/VMT), Fork Truck
E=	3.36	0.87	Emission factor (lb/VMT), Cars
E=	6.39	1.66	Emission factor (lb/VMT), Trucks
	Emissions = E*VMT = E*Mi*O		
Mi=	0.96	0.96	Miles/day - Fork Truck
Mi=	1.15	1.15	Miles/day - Cars
Mi=	0.04	0.04	Miles/day - Trucks
O=	260	260	days/year
Emissions =	2426	631	lbs/year
Emission Control =	50%	50%	% - Mag Chloride application & sweeping
Emissions =	1213	315	lbs/year controlled

Notes:

1. Used midpoint of silt content and moisture content from Table 13.2.2-3. Range of Source Conditions Used in Developing Equation 1.
2. PM30 assumed to equal Total Suspended Particulate (TSP)
3. 10% of the significance level for ozone = 4 tons/year VOC
4. 10% of the significance level for PM-10 = 1.5 tons/year PM-10
5. 10% of the significance level for PM = 2.5 tons/year PM